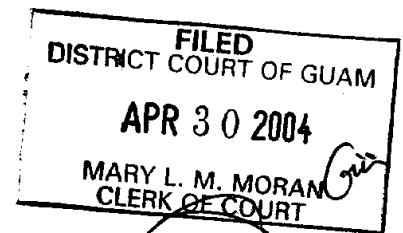


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Attorneys for Defendant The Hongkong and Shanghai Banking Corporation Ltd.

IN THE DISTRICT COURT OF GUAM

ALAN SADHWANI, LAJU	)	CIVIL CASE NO. 03-00036
SADHWANI, and K. SADHWANI'S	)	
INC., a Guam corporation,	)	
	)	
Plaintiffs,	)	<b>MOTION TO STRIKE FIRST</b>
	)	<b>AMENDED COMPLAINT IN</b>
v.	)	<b>WHOLE OR IN PART OR,</b>
	)	<b>IN THE ALTERNATIVE,</b>
HONGKONG AND SHANGHAI	)	<b>MOTION TO DISMISS THIRD</b>
BANKING CORPORATION, LTD.,	)	<b>AND SIXTH CAUSES OF</b>
et al.,	)	<b>ACTION [FRCP 12(b)(6), (f)]</b>
Defendants.	)	<b>AND FOR SANCTIONS</b>
_____	)	<b>[FRCP 11(b)]</b>

TO: PLAINTIFFS, and their attorneys, Arriola Cowan & Arriola

You are hereby advised that as soon as the matter can be heard at the District Court of Guam, 520 W. Soledad Avenue, 4<sup>th</sup> Floor, Hagåtña, Guam 96910, Defendant The Hongkong and Shanghai Banking Corporation Limited ("HSBC") will move the Court for an Order striking the First Amended Complaint filed herein on April 27, 2004, in whole or in part and for sanctions or, in the alternative, dismissing the Third and Sixth Causes of Action in the First Amended Complaint, pursuant to Rules 11(b), 12(f) 12(b)(6), and 15 of the Federal Rules of Civil Procedure, as more fully explained in the

ORIGINAL

Sadhwani, et al. v. Hongkong and Shanghai Banking Corporation Ltd., et al.

Civil Case No. 03-00036

Motion to Strike First Amended Complaint in Whole or in Part or, in the Alternative, Motion to Dismiss Third and Sixth Causes of Action and for Sanctions

Page 2 of 2 pages


Memorandum of Points and Authorities contemporaneously filed herein.

The motion will be based upon this Motion, the Memorandum of Points and Authorities filed herein, the papers, records, and files in this action, and upon such oral and documentary evidence as may be presented at the hearing of the Motion.

Dated this 30<sup>th</sup> day of April, 2004.

LAW OFFICES OF BRONZE & TANG, P.C.  
Attorneys for Defendant The Hongkong and  
Shanghai Banking Corporation Ltd.

By:

  
JACQUES G. BRONZE